CONTAINS ENFORCEMENT-SENSITIVE INFORMATION

MEMORANDUM

DATE: June 02, 1995

SUBJ: Request for a Removal Action
Accu-Circuits, Inc. Site
Bloomfield, CT - **Action Memorandum**

FROM: Ted Bazenas,
On-Scene Coordinator

TO: John DeVillars,
Regional Administrator

THRU: Edward J. Conley, Director
Environmental Services Division

I. PURPOSE

The purpose of this Action Memorandum is to request and document approval of a proposed removal action described herein for the Accu-Circuits, Inc. Site in Bloomfield, Connecticut.

The potentially responsible party has indicated a willingness to participate in the removal action by performing portions of the work under a unilateral administrative order (UAO). If the PRP fails to adequately perform the actions described in the UAO, EPA will assume management of the site as a fund lead removal action.

II. SITE CONDITIONS AND BACKGROUND

CERCLIS ID#: CTD983887803
SITE ID# : 2H
CATEGORY : TIME CRITICAL

A. SITE DESCRIPTION

1. Background

Accu-Circuits, Inc. manufactured printed circuit boards for the computer industry. The facility is located at 81 Old Windsor Road in Bloomfield Connecticut. Manufacturing began in mid 1991; the facility ceased

operation in October of 1994. The building has been maintained by Accu-Circuits, Inc since that time.

On February 10, 1995, the Accu-Circuits, Inc. Site was referred to the EPA Emergency Planning and Response Branch, Site Evaluation and Response Section (SERS) by the EPA Environmental Studies Section (Water). The referral was the result of a unannounced water compliance inspection conducted on January 09, 1995. The Site was reported to be inactive for over 120 days, but continued to maintain all chemicals on site. The wastewater discharge point had been plugged by the Town of Bloomfield to prevent the possibility of spills entering the sewer system.

The property is owned by Tolland Enterprises of East Hartford, Connecticut and is leased to Accu-Circuits, Inc.

2. Removal Site Evaluation

On March 27, 1995, the EPA SERS conducted a Preliminary Assessment/Site Investigation (PA/SI) at Accu-Circuits, Inc. to evaluate the site for possible Removal Action. The PA/SI reported that no activity had occurred at the site since the previous inspection. The operator continues to heat the building, but little or no other maintenance or attempt to properly dispose of hazardous materials had occurred. The PA/SI noted the potential for release of hazardous substances from the site and the proximity of residential areas to the site. A partial inventory of containers and stored chemicals was completed; no samples were collected.

3. Physical Location and Site Characteristics

The Accu-Circuits, Inc. site ("Site") is located on approximately 3 acres of land at 81 Old Windsor Road, Bloomfield, Connecticut. The Site is bounded by Kaman Corp. and residential property to the north, a small trucking company to the east, residential properties to the south, and the Bloomfield Animal Hospital to the west. The property is entirely paved with blacktop, except for the building itself. A storm drain in the front of the building appears to drain directly into a small stream to the east. The building itself is constructed of cinder blocks, and is fairly good condition. One broken window was noticed on the west side of the building. The front and sides of the property are partially secured by an 8-foot chain link fence; however, the gate is unlocked. Access to the site from the rear is restricted only by vegetation. A storage trailer containing equipment is located at the rear of the property. Two loading docks are located at the east end of the building.

4. Release or Threatened Release into the Environment of a Hazardous Substance or Pollutant or Contaminant

The building interior contains approximately 90 uncovered electroplating baths, most of which each contain over 100 gallons of plating chemistry, and approximately 250 containers (55 gallon drums, 30 gallons drums, 5

gallon pails and smaller bottles) of various chemicals associated with the plating industry. Three drums of waste sludge were found near the loading dock. There are at least three 1500 gallon water treatment vessels inside the building that are partially full.

Hazardous substances involved in the release or threat of release at the Site include, but are not limited to, hydrochloric acid 48% solution, sulfuric acid 93% solution, nitric acid 50% solution, formaldehyde 37% solution, potassium permanganate solid, xylene, lead fluborate, and ammonia. Each of these chemicals are hazardous substances as defined in section 101(14) of the Comprehensive Environmental Response Compensation and Liability Act (CERCLA).

5. NPL Status

The Site is not currently on the National Priority List (NPL), nor is it expected to be so. The Site has not received a Hazard Ranking System Rating and is not being evaluated by the Agency for Toxic Substances and Disease Registry (ATSDR).

B. OTHER ACTIONS TO DATE

1. Previous Actions Conducted by State and Local Officials

State of Connecticut Department of Environmental Protection (CTDEP) has not inspected Accu-Circuits, Inc. CTDEP personnel have been informed by EPA of federal involvement at the Site. Due to their limited resources and funding restrictions, CT DEP assented to EPA being the lead agency for the Site. EPA also informed local officials of federal involvement at this site.

C. STATE ROLES

The CTDEP and EPA will continue to cooperate in effective clean up efforts at Accu-Circuits, Inc. CTDEP has offered enforcement support to EPA.

III. THREATS TO PUBLIC HEALTH OR WELFARE OR THE ENVIRONMENT, AND STATUTORY AND REGULATORY AUTHORITIES

A. THREATS TO PUBLIC HEALTH OR WELFARE

The Accu-Circuits, Inc. facility contains hazardous substances in drums, barrels, tanks and other containers that may pose a threat of release. Although no releases were noted during site inspection, the facility ceased operation in October of 1994 and the containers remain in the building. The PRPs are unable to continue maintaining the security of the containers and the building. Residential property is located within 1000 feet of the building. The primary threat to nearby populations

would be a fire in the facility that would release toxic fumes and particulates into these residential areas. Due to the amount of incompatible materials in the plating baths and the hazardous substances stored at the site, a fire at this facility would result in a substantial release of these hazards to the environment and a potentially significant impact on residents.

The following toxicological information on the primary identified contaminants at the site was summarized from the Handbook of Toxic and Hazardous Chemicals and Carcinogens, 2nd Edition, by Marshall Sittig:

Hydrochloric acid, sulfuric acid, and nitric acid are all powerful acids that are toxic by inhalation and ingestion; also cause corrosion of the skin on contact.

Formaldehyde is toxic by inhalation and is a strong irritant to skin and mucous membranes. Formaldehyde may be a carcinogen.

Potassium permanganate is a dangerous fire and explosion risk when in contact with organic materials; also a powerful oxidizing agent and skin irritant.

Xylene may cause irritation of the eyes, nose and throat when inhaled. Inhalation of high levels f xylene may cause central nervous system depression and effect the liver and kidneys. Xylene also causes skin irritation on contact.

Ammonia is intensely irritating to mucous membranes, eyes and skin, and may cause blindness. Ammonia is a strong alkaline, and therefore incompatible with strong oxidizers such as potassiou permanganate or bleach solutions.

B. THREATS TO THE ENVIRONMENT

A potential release of hazardous liquids from the facility would impact surface water via storm drain discharge to a stream adjacent to the facility. In the event of a fire at the facility, toxic fumes and particulate would be released from the Site.

In addition, the primary sewer discharge from the site is to the Hartford Municipal District Commission Water Treatment System. Municipal systems are generally designed to treat only municipal waste water and cannot remove high levels of hazardous substances such as those found at the Site. These substances may be toxic to the bacteria used to treat sewage and to the operating system itself. In the event of a release, these substances could eventually migrate thought the system to the discharge point on the Connecticut River.

IV. ENDANGERMENT DETERMINATION

Actual or threatened releases of hazardous substances from this site, if not addressed by implementing the response action selected in this

Action Memorandum, may present an imminent and substantial endangerment to public health, or welfare, or the environment.

V. PROPOSED ACTIONS AND ESTIMATED COSTS

A. PROPOSED ACTIONS

1. Proposed Action Description

- All containers within the Accu-Circuits, Inc. building will be stabilized to prevent accidental releases. Any leaking or deteriorated containers will be immediately overpacked. When deemed safe by the OSC, the containers will be inventoried, segregated and staged in a safe and secure area of the facility. Plating vats will be inventoried and covered as necessary.

- Sampling and analysis of all containers will be conducted for disposal needs.

- Sludge present in plating vats, below floor boards, in treatment vessels, and in the filter press system will be collected and containerized for disposal.

- Laboratory packing will be used to consolidate smaller containers.

- All hazardous materials will be prepared for off-site disposal.

- All hazardous materials will be transported to an off-site, licensed EPA approved disposal facility, in accordance with Code of Federal Regulations (CFR) Title 40, Protection of the Environment, part 300, National Oil and Hazardous substances Pollution Contingency Plan, Section 440, Procedures for planning and implementing off-site response actions (40 CFR 300.440).

2. Contribution to Remedial Performance

The Site is not currently on the NPL, nor is it likely to be proposed. The cleanup proposed in this Action Memorandum is designed to provide the remedy to mitigate threats to human health and the environment posed by the Site. Any actions taken will be consistent with any possible remedial action and will not impede any future responses.

3. Description of Alternative Technologies

The OSC will review and consider other alternative technologies for cleanup and disposal of the substances present at the site after a complete inventory has been compiled. Determinations will be based on cost effectiveness and environmental benefit. Options to be considered

will include re-use or recycling of plating solutions and other chemical substances in the inventory.

4. Applicable or Relevant and Appropriate Requirements (ARARs)

Federal ARARs:

40 CFR Part 262 - Standards Applicable to Generators of Hazardous Waste
Subpart B - The Manifest

Citation: 262.20
Requirement: General requirements for manifests

Citation: 262.21
Requirement: Acquisition of manifests

Citation: 262.22
Number of copies of manifests

Citation: 262.23
Requirement: Use of the manifest

Subpart C - Pre-Transport Requirements

Citation: 262.30
Requirement: Packaging

Citation: 262.31
Requirement: Labeling

Citation: 262.32
Requirement: Marking

Subpart D - Recordkeeping and Reporting

Citation: 262.40
Requirements: Recordkeeping

40 CFR 264 - Standards For Owners and Operators of Hazardous Waste Treatment, Storage, and Disposal Facilities

Subpart I - Use and Management of Containers

Citation: 264.171
Requirements: Condition of containers

Citation: 264.172
Requirements: Compatibility of waste with containers

Citation: 264.173
Requirements: Management of containers

Citation: 264.174
Requirements: Inspections of containers

40 CFR 268 - Land Disposal Restrictions

Subpart C - Prohibitions on Land Disposal

Citation: 268.30
Requirements: Waste specific prohibitions - Solvent wastes

40 CFR 300 National Contingency Plan

Subpart E - Hazardous Substance Response

Citation: 300.440
Requirements: Procedures for planning and implementing off-site response actions

STATE ARARs:

The OSC requested State ARARs from the CTDEP. These will be included as an attachment when they are received.

Additional ARARs may be identified as the removal action progresses and the cleanup methods are selected. In accordance with the National Contingency Plan and the EPA Guidance documents, the OSC will determine the practicability of complying with all identified ARARs.

5. Project Schedule

It is expected to take approximately four weeks to stabilize the site. Following stabilization, transportation and final disposal is expected to take an additional six weeks. The cleanup should be completed within three months from the date of mobilization.

B. ESTIMATED COSTS

Extramural Costs

Cleanup contractor costs	$350,000
20% contingency	$70,000
Cleanup Contractor Total	**$420,000**
Technical Assistance Team	$50,000
20% Contingency	$10,000
Technical Assistance Team Total	**$60,000**
EXTRAMURAL TOTAL	**$480,000**

Intramural Costs

EPA Costs	$60,000
TOTAL REMOVAL PROJECT CEILING	**$540,000**

VI. EXPECTED CHANGE IN THE SITUATION SHOULD ACTION BE DELAYED OR NOT TAKEN

Delayed action will increase the public health risk to the nearby residents and the local environment. The site is not stable and addition delay could result in a release due to continued deteriorating conditions, fire or vandalism.

VII. OUTSTANDING POLICY ISSUES

There are no policy issues of national significance involved with this site.

VIII. ENFORCEMENT

ATTACHED TO THIS DOCUMENT - FOR INTERNAL DISTRIBUTION ONLY

IX. RECOMMENDATION

This decision document represents the selected removal action for the Accu-Circuits, Inc Site in Bloomfield, Connecticut, developed in accordance with CERCLA, as amended, and which is consistent with the National Contingency Plan (NCP). This decision is based on the documents that will be contained in the administrative record for the site.

Conditions at the Accu-Circuits, Inc Site meet the criteria in NCP Section 300.415 (b)(2) as follows:

Actual or potential exposure to nearby human populations, animals, or the food chain from hazardous substances or pollutants or contaminants... (i)

Hazardous substances or pollutants or contaminants in drums, barrels, tanks or other bulk storage containers, that may pose a threat of release... (iii)

Weather conditions that may cause hazardous substances or pollutants or contaminants to migrate or be released... (v)

Threat of fire or explosion... (vi)

Availability of other appropriate federal or state response mechanisms to respond to the release... (vii)

Therefore, I recommend your approval of this removal action. The estimated total project costs at this time are $540,000 of which $480,000 is for extramural cleanup contractor support.

APPROVAL:_____ DATE:_____

DISAPPROVAL:_____ DATE:_____